



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 9, 2012

CHET S. GOODWIN, TREASURER  
GARY JOHNSON 2012 INC  
280 SOUTH 400 WEST STE 220  
SALT LAKE CITY, UT 84101

**Response Due Date**

**04/13/2012**

IDENTIFICATION NUMBER: C00495622

REFERENCE: YEAR-END REPORT (10/01/2011 - 12/31/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

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Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

**2.** Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B-P supporting Line 23 of your report to clarify the attached description(s). For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at [http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\\_purpose\\_list\\_3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf).

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

Sincerely,

A handwritten signature in black ink that reads "Benjamin G. Holly". The signature is written in a cursive style with a large, stylized "B" and "H".

Ben Holly  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Inadequate Employer/Occupation Entries**  
**Gary Johnson 2012 Inc (C00495622)**

Employer	Occupation
NA	Business Dev
Self Employed	Capitalist
Self	Communication
Self	Consult
NA	Design
tbc	eng
NA	Finance
Self Employed	Finance
Self	Health Care
Self	Healthcare
Self Employed	NA
NA	NA
Self	RE
Self Employed	Sales
Self	Self
NA	Self
Self Employed	Self Emmployed
Self Employed	Service
Self Employed	Services
Self Employed	Trainign
Self	Training
Self	Transportation

**Inadequate Purposes of Disbursement**  
**Gary Johnson 2012 Inc (C00495622)**

Name	Date	Amount	Purpose
Political Advisors	10/9/11	\$20,000.00	Check # 1058 Operating Expenses
Political Advisors	10/11/11	\$6,000.00	Check # 1060 Operating Expenses
Political Advisors	10/17/11	\$3,500.00	Check # 1062 Operating Expenses
Political Advisors	10/24/11	\$10,000.00	Check # 1063 Operating Expenses
Political Advisors	10/27/11	\$7,900.00	Check # 1066 Operating Expenses
Political Advisors	10/31/11	\$6,400.00	Check # 1068 Operating Expenses
Bydlak, Jonathan M	11/3/11	\$2,500.00	Check # 1070
Political Advisors	11/7/11	\$9,000.00	Check # 1071 Operating Activities
Political Advisors	11/9/11	\$10,600.00	Check # 1072 Operating Expenses
Political Advisors	11/14/11	\$4,568.37	Check # 1073 Operating Expense
Bydlak, Jonathan M	11/17/11	\$1,000.00	Check # 1076 Fundraising
Political Advisors	11/17/11	\$10,400.00	Check # 1077 Operating Expenses
Political Advisors	11/17/11	\$4,900.00	Check # 1078 Operating Expenses
Political Advisors	11/23/11	\$2,200.00	Check # 1079 Operating Expenses
Political Advisors	11/28/11	\$4,000.00	Check # 1080 Operating Expenses
Political Advisors	12/25/11	\$3,300.00	Check # 1082 Operating Expenses
Political Advisors	12/9/11	\$2,200.00	Check # 1083 Operating Expense
Political Advisors	12/12/11	\$2,500.00	Check # 1084
Political Advisors	12/15/11	\$750.00	Check # 1085 Operating Expense
Political Advisors	12/19/11	\$1,350.00	Check # 1086 Operating Expenses
Political Advisors	12/22/11	\$3,900.00	Check # 1087 Operating Expenses
Political Advisors	12/27/11	\$3,500.00	Check # 1089 Operating Expenses
Political Advisors	10/6/11	\$2,326.78	Check 1059 Operating Expenses
Political Advisors	10/13/11	\$5,600.00	Check 1061 Operating Expenses
Political Advisors	11/14/11	\$2,631.63	Check 1073 Operating Expenses
Political Advisors	12/28/11	\$5,200.00	Check 1090 Operating Expenses